

Broadband over power lines (BPL) is a technology of marginal benefit and tremendous adverse impact. Power companies are proposing sending and receiving broadband digital data, at rates competitive with DSL and DOCSIS cable, over electrical power lines which are not designed as non-radiating transmission lines. This will cause severe and intolerable interference to any radio services, including amateur, military, and US government agency users, throughout the HF, VHF, and UHF portions of the spectrum since the proposed system would radiate broadband noise at very high levels across a wide range of frequencies.

Tests in existing BPL test areas have shown unequivocally that the system will radiate noise extensively. As yet, testing in limited areas has not generated noise sufficient to propagate into other regions via ionospheric reflection, but a widespread implementation of BPL almost certainly would, spreading noise into virtually every part of the world. This would render existing HF radio services almost completely useless.

As long as the technology is in the testing stage and has not been marketed or sold to customers, the FCC has a chance to head off this proposal before it becomes a communications disaster. Once it is in widespread use and there is extensive penetration and infrastructure invested in it, and customer expectations of service availability and quality are set, it will be much harder to stop, and the damage to our communications infrastructure may well be irreversible.

Now is the time to ask the uncomfortable questions that need to be asked of the service providers that are proposing this service, and while it is obvious that these proposed service providers are actively interested in obtaining approval of this technology by any means, it is the FCC's responsibility to be critical of this concept and protect the other use of the spectrum that would be affected and negatively impacted by its approval for use by the general public. I realize that the FCC has also taken on the mandate of promoting telecommunications technology, but the drawbacks of this technology far outweigh its limited benefits.